

## Schary, Claire

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**From:** Schary, Claire  
**Sent:** Wednesday, November 20, 2013 1:30 PM  
**To:** Bott, Dustan; Park, Chae; Ryan, Mark; Poulsom, Susan  
**Cc:** Stewart, William C.; Psyk, Christine; Gable, Kelly; Rose, Bob  
**Subject:** Water quality trading docs - where to focus your reading

Dustan, Chae, Mark, & Susan,

I just want you to know I recognize how hard this assignment is - to read these massive documents when you are really on the team to cover a portion of the topics. I also don't think they are easy to read, period (especially the baseline one - the 23-page one - and I also don't agree with very much of what is stated, so I'm going to suggest to them they try a different approach to the discussion). Therefore, I am trying to identify the specific sections I want you to focus on so here's what I've come up with:

-- If you are ready to start reading, please look through the mock trade document (the shortest one at 9 pages and what the first day will start with), and then start on the largest one (the 90 page one).

Here's what you should read in the long document:

-- I want Susan to look at the permits stuff which start on page 11, and others can skim that too, to the extent that could relate to enforcement issues (i.e., what provisions need to go where in the permit to be correct and enforceable).

-- Then I think you need to focus on the reporting requirements which start on page 21, and perhaps the process for approving BMPs, which is on page 28.

-- The next section of the document gets into how to quantify credits (which is wrapped up in the very confusing baseline issue), trading ratios, etc. which you may be interested in, but is not what I expect you to be expert in.

-- Make sure you look at the Project Implementation and Quality Assurance Standards section, which begins on page 58, the Verification & Certification section which begins on page 62, and Registration on page 66. What I want you to think about is what does the permit need to say about all of this, so that we are satisfied it's enforceable and we know how it all works. I'm also really interested in if we can streamline what gets mentioned in the permit if the state can establish or contract out to a registry instead that oversees the verification, certification, and registration process.

-- Then please look at the Compliance Determination & Enforcement Actions section which begins on page 68.

There's a full glossary in the back that you can refer to, and also we need to make sure the definitions are correct.

And Bill is helping me get through the baseline and TMDL-related sections, so we're all overwhelmed by this.

I want to submit any important comments in advance, so please let me know if you find any glaring errors or omissions, or have comments to share with them before the Dec. 2-3 meeting. I want to consolidate our comments, and will be sure to copy all of you on any that I send them before the meeting.

Thanks, and happy reading!

-- Claire

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